

VERNON BATES,

Plaintiff,

v.

AMAZON LOGISTICS, INC. d/b/a
Amazon Prime,

and

BANANA LOGISTICS, LLC,

and

ABDURAZAQ A. JAMA,

Defendants.

Defendants, Amazon Logistics, Inc. d/b/a Amazon Prime (“Defendant” or “Amazon”), by and through undersigned counsel of record, Daniel E. Tranen of Wilson Elser Moskowitz Edelman & Dicker LLP, pursuant to Federal Rule of Civil Procedure 6(b), and for its Unopposed Motion and Notice of Initial Extension of Time to File Responsive Pleading, states as follows:

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4. Counsel for Plaintiff has agreed to an extension of the deadline for the filing of Defendant's responsive pleading for 14 days, up to and including March 31, 2020.

5. The responsive pleading deadline has not been previously extended.

6. The extension does not interfere with any case management plan, scheduled hearings, or other case deadlines.

7. This motion is not being made for the purpose of delay, but for Defendant's counsel to perform the necessary due diligence in order to answer or otherwise plead appropriately.

8. Plaintiff will not be prejudiced by this extension.

9. Plaintiff does not object to Defendant's motion and consents to same.

WHEREFORE, Defendant, Amazon Logistics, Inc. d/b/a Amazon Prime, respectfully request that this Honorable Court grant Amazon an extension to file its responsive pleading to Plaintiff's Complaint to March 31, 2020.

DATED: March 16, 2020

Respectfully submitted,

**AMAZON LOGISTICS, INC. D/B/A AMAZON
PRIME**

/s/ Daniel E. Tranen

Daniel E. Tranen, 30316-45

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